

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A  
BRAZOS LICENSING AND  
DEVELOPMENT,**

**Plaintiff,**

**v.**

**GOOGLE LLC,**

**Defendant.**

§ **CIVIL ACTION 6:20-CV-00575-ADA**  
§ **CIVIL ACTION 6:20-CV-00577-ADA**  
§ **CIVIL ACTION 6:20-CV-00580-ADA**  
§ **CIVIL ACTION 6:20-CV-00585-ADA**

§  
§  
§ **PATENT CASE**

§  
§  
§  
§ **JURY TRIAL DEMANDED**

**RESPONSE OPPOSING DEFENDANT'S MOTION FOR ORAL HEARING ON  
DEFENDANT GOOGLE LLC'S MOTION TO DISMISS**

WSOU recognizes that this Court has discretion whether to conduct a hearing, and respectfully submits that Google's motion for oral hearing on its motions to dismiss in the above-captioned cases should be denied. WSOU does not believe an oral hearing is necessary to clarify any issues implicated by Google's motions to dismiss.

Dated: April 22, 2021

Respectfully submitted,

/s/ Ryan S. Loveless

James L. Etheridge  
Texas State Bar No. 24059147  
Ryan S. Loveless  
Texas State Bar No. 24036997  
Travis L. Richins  
Texas State Bar No. 24061296  
Brett A. Mangrum  
Texas State Bar No. 24065671  
Jeffrey Huang  
ETHERIDGE LAW GROUP, PLLC  
2600 E. Southlake Blvd., Suite 120 / 324  
Southlake, Texas 76092  
Telephone: (817) 470-7249  
Facsimile: (817) 887-5950  
Jim@EtheridgeLaw.com  
Ryan@EtheridgeLaw.com  
Travis@EtheridgeLaw.com  
Brett@EtheridgeLaw.com  
JeffH@EtheridgeLaw.com

Mark D. Siegmund  
Texas State Bar No. 24117055  
LAW FIRM OF WALT FAIR, PLLC  
1508 North Valley Mills Drive  
Waco, Texas 76710  
Telephone: (254) 722-6400  
Facsimile: (254) 722-6432  
mark@waltfairpllc.com

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I certify that the foregoing document was served upon all counsel of record via email in accordance with the Federal Rules of Civil Procedure on April 22, 2021.

/s/ Ryan S. Loveless

Ryan S. Loveless